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August 20, 2014

VIA ELECTRONIC FILING and HAND DELIVERY

Honorable Thomas P. Griesa
United States District Court
Southern District of New York
500 Pearl Street, Room 1630
New York, New York 10007-1312

Re: **Allen Applestein, et al. v. The Republic of Argentina,
02 Civ. 04124 (TPG)**

Your Honor:

We represent the plaintiffs in the above-captioned action and related actions ("Plaintiffs"). Enclosed herewith please find a Stipulation seeking an extension of time for non-party Bank of New York Mellon ("BNY Mellon") to respond to Plaintiff's Motion for Turnover Order against BNY Mellon dated August 7, 2014 ("Motion for Turnover Order").

By way of background, almost all of the moving Plaintiffs are Italian Citizens who purchased bonds issued by the Republic of Argentina (the "Republic") and have subsequently obtained money judgments as a result of the Republic having defaulted on the bonds. On June 26, 2014, the Republic transferred approximately \$539 Million (the "Funds") into a bank account owned and controlled by BNY Mellon for the purpose of making coupon payments on certain Exchange Bonds issued by the Republic. These proposed coupon payments were directly contrary to this Court's February 23, 2012 and November 21, 2013 Orders in *NML Capital, Ltd v. The Republic of Argentina* Case Nos. 08 Civ. 6978 (TPG), 09 Civ. 1707 (TPG), 09 Civ. 1708 (TPG) (S.D.N.Y.), and, as a result, BNY Mellon refused to make the payments. This Court ordered that BNY Mellon continue to maintain possession of the Funds until a final determination is made as to what to do with the Funds.

On August 7, 2014, Plaintiffs filed the Motion for Turnover Order, seeking an order, pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and Section 5225(b) of the New York Civil Practice Law and Rules, directing BNY Mellon to turnover to Plaintiffs the Funds, or so much of it as is sufficient to satisfy their judgments, plus post-judgment interest.

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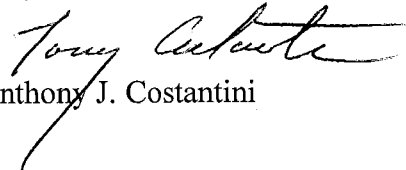
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Plaintiffs and BNY Mellon now seek permission from the Court to extend the time for responding to Plaintiffs' Motion for Turnover Order pursuant to the terms and conditions of the attached Stipulation. Per Your Honor's Individual Rules I.E, we state as follows:

1. The original date that BNY Mellon's response to the Motion for Turnover Order was due is August 21, 2014 and Plaintiffs' reply was due on August 28, 2014. Pursuant to the proposed Stipulation, BNY Mellon's response will now be due on September 15, 2014 and Plaintiffs' reply will be due on September 30, 2014.
2. The parties have not previously requested an extension with regards to the Motion for a Turnover Order.
3. No previous requests have been granted or denied.
4. Plaintiffs and BNY Mellon consent to the extension.

Thank you for your consideration with regards to this matter.

Very truly yours,


Anthony J. Costantini

AJC/gg

Enclosure